

VIA ECF

June 25, 2015

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The Honorable George B. Daniels
United States District Judge, Southern District of New York
500 Pearl Street, Chambers 1310
New York, NY 10007

**RE: Securities and Exchange Commission v. Javier Martin-Artajo, et al. (Docket
No: 1:2013-cv-05677)**

Dear Judge Daniels:

We write on behalf of C.S. Venkatakrisnan and Alistair Webster regarding the issues raised in the June 3, 2015 letter from the U.S. Attorney's Office (the "USAO"), and the June 19, 2015 letter from the U.S. Securities and Exchange Commission ("SEC").

As non-party deponents in this action, our clients do not have a position with respect to the order of depositions. However, we understand from the SEC's letter that there exists the possibility, should the USAO's request not be granted, that the parties will seek to depose our clients multiple times (*i.e.*, once before the defendants are deposed, and then again afterwards). We write to express our view that, for reasons of efficiency, fairness and avoidance of professional and personal disruption for such third-party witnesses (including the fact that Mr. Webster resides in the United Kingdom), our clients should not be required to sit for multiple depositions in this matter.

Respectfully submitted,

/s/ Daniel F. Schubert

Daniel F. Schubert

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